



Federal Communications Commission
Washington, D.C. 20554

September 13, 2022

The Honorable Karen Charles Peterson
Commissioner, Massachusetts Department of Telecommunications and Cable
Chairwoman, North American Numbering Council
1000 Washington Street, Suite 600
Boston, Massachusetts 02118

Re: Numbering Administration Oversight Working Group

Dear Chairwoman Charles Peterson:

The Commission greatly appreciates the North American Numbering Council's (NANC's) continuing efforts to provide its advice and expertise regarding efficient and impartial numbering administration. In particular, the Commission is grateful for the work by the NANC's Numbering Administration Oversight Working Group (NAOWG) in response to the Wireline Competition Bureau's (Bureau's) February 9, 2022 request that the NANC, through the NAOWG, "explore the possibility of improved and innovative conservation and utilization options to ensure that the nation's numbering resources will last as long as possible" including "individual telephone number (ITN) pooling" and "[a]ny suggestions the NANC may have for alternative means, other than ITN pooling, of tailoring numbering resource allocation closer to actual service provider needs and enhancing [numbering] conservation and utilization."¹

The Bureau has determined that its original request regarding alternatives was too narrow. While matching allocation to needs as closely as feasible remains a core tenet of numbering resource conservation policy, we also seek an overall assessment of a full range of options to maximize the efficiency and longevity of the North American Numbering Plan. At this time, the Bureau amends the February 9, 2022 request and directs that the NANC (through the NAOWG) broaden its work to consider a full spectrum of potential options for numbering resource conservation, including ITN pooling, and submit its report on this no later than March 2, 2023. Please have the NAOWG submit a draft of this report to the Bureau no later than January 31, 2023.

In broadening your report, please consider, among other things, options that might require revisions to or waivers of the Commission's rules, as well as delegations of additional authority to state regulatory commissions (such as to conduct ITN pooling trials). In addition,

¹ Letter from Kris Anne Monteith, Chief, Wireline Competition Bureau, Federal Communications Commission to the Honorable Karen Charles Peterson, Chairwoman, North American Numbering Council (Feb. 9, 2022), <https://docs.fcc.gov/public/attachments/DOC-380121A1.pdf>, at 1, 3 ("Charge Letter"). *See also* Letter from Trent B. Harkrader, Chief, Wireline Competition Bureau, Federal Communications Commission to the Honorable Karen Charles Peterson, Chairwoman, North American Numbering Council (July 1, 2022), <https://www.fcc.gov/sites/default/files/naowg-itn-extension-request-wcb-letter-07-01-22.pdf> (extending the August 15, 2022 deadline to October 7, 2022).

please consider actions that could be taken by state regulatory commissions under authority already delegated by the Commission, and options that could be effectuated through revisions to industry guidelines. In all cases, please suggest means by which stakeholders could most effectively aid Commission, state regulatory commission, and industry efforts. As part of any NANC conclusion that the level of effort or cost of an option will be potentially prohibitive, the NANC should first endeavor to estimate such level of effort or cost. If this is not possible, the NANC should specify the precise nature of such costs and efforts and explain why estimates cannot be provided.

We understand that there may be a logical sequence or priority among numbering resource conservation efforts. For example, are there any options that might produce particularly large gains for the effort and cost required, that perhaps should be pursued at the earliest possible date? Are there certain options that might be most effective if preceded by other options? Should trials of any options be conducted prior to full implementation?

If you have questions about this referral, please contact Christi Shewman, the NANC Designated Federal Officer, at christi.shewman@fcc.gov. We appreciate the NANC's continuing efforts on this report.

Sincerely,

A handwritten signature in blue ink, appearing to read "Trent B. Harkrader". The signature is fluid and cursive, with a long horizontal stroke at the end.

Trent B. Harkrader
Chief,
Wireline Competition Bureau